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BY ECF

Honorable Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
New York, NY 11201

**RE: *Securities & Exchange Commission v. Abujudeh*,
1:21-cv-04110-PKC-CLP**

Dear Chief Magistrate Judge Pollak:

On July 6, 2022, the Court ordered the Parties to provide a status report by September 5, 2022. Accordingly, the Parties provide the following updated information in response to the Court's order.

As noted in our last status report, the Parties have agreed on the liability issues as stated in the SEC's complaint. Since then, the Parties have made substantial progress in negotiating the terms of disgorgement and other relief sought by the Commission. To allow the Parties to conclude these settlement negotiations, and to allow time for the Commission Staff to obtain Commission approval of any proposed resolution, the Parties respectfully request that the case remained stayed and that the Court order the Parties to provide a further status report within 60 days.

We are available if the Court has any questions.

Respectfully submitted,

/s/ Russell D. Duncan

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cc: Nita K. Klunder, Counsel for the Securities & Exchange Commission (by email and ECF)